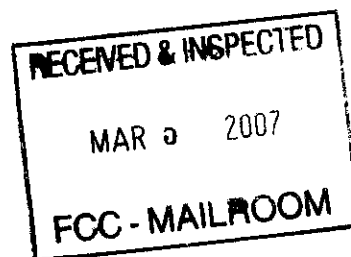


Coahoma Agricultural High School

Carol Borgognoni, Technology Specialist
3240 Friars Point Road, Clarksdale, MS 38614
Phone: 662-621-4260 •••• Fax: 662-624-4315
Email: cborgognoni@mde.k12.ms.us

February 26, 2007

Attn: Judy Haley
Federal Communications Commission
Cores Administrator
Rm 2 - A842
445 12th Street SW
Washington D.C. 20554



DOCKET FILE

CC Docket No.96-45
CC Docket No. 02-6

This is a letter of appeal.

Form 472 Invoice Number: 386096
Service Provider Identification Number: 143026
Applicant Form 472 Identifier: CAHSBEAR3
Billed Entity Number: 128535
Funding Request Number: 823440
471 Applicant Number: 314299
Funding Year: 07/01/2002 - 06/30/2003
Funding Commitment Decision: \$11,911.50
Reimbursement Amount for this FRN: \$11,911.50

USAC letters received:

Re: Notification of Improperly Disbursed Funds Letter
Date of notification from SLD: May 16, 2006

Re: Demand Payment Letter

Date of notification from SLD: January 4, 2007 and February 6, 2007.
Dates: Funding Year 2002: 7/01/2002-6/30/2003

Statement

The appeal is for reimbursement of funds for internal connections, which were filed under the FRN 823440 and 471 Application 314299. The previous appeal ended in a denial. I believe that the decision was unjustly denied and believe that it must be reversed. The previous appeal was not delivered correctly or in detail so there may be room for error in the decision. This appeal, as you will see, will give more indepth detail and in date order so that there is little confusion. The timeline is very important in determining the outcome. I will admit, before hand, that there are some dates that are very much wrong. I think if you look at the timeline and use the dates that should have be used, you will see the true picture. I believe after reviewing these details and documentations, it will be understood why the denial of funds should be reversed.

All documentation pertaining to both FRN is included.

Thank you,
Carol Borgognoni, Technology Specialist
Coahoma AHS District

No. of Copies rec'd 0
List ABCDE

I will be discussing two different FRNs: 824430 and FRN:820443. The first 824430 is the one in question but both relate to the same dates and vendors. Information concerning both is crucial to showing the reason why the denial is wrong. One FRN was approved, while the other was not.

Here is the basic information on both FRNs that are being to be referenced.

470 Form Identifier	CAHS470D	CAHS470D2
470 Application Number	864830000384604	864830000384604
471 Application Number	313341	314299
471 Application Identifier	CAHS471D	CAHS471D2
FRN	823443	823400
Original Service Provider	McInnis Electric, Inc.	MircoWarehouse
Original Provider's SPIN	143006222	143004694
New Service Provider	Julian Construction	Julian Construction
New Provider's SPIN	1430262328	1430262328
Contract Award Date	July 1, 2002	July 1, 2002
Allowable Service Start Date	July 1, 2002	July 1, 2002
Contract Expiration Date	June 30, 2003	June 30, 2003
Pre-Discount Amount	\$53,55.13	\$12,235.00
Funding Commitment	\$48,200.52	\$11, 911.50

The documentation begins with the very first process and goes through the last letter received.

470

November 26, 2001

On November 26, 2001, four 470s were filed with USAC. The two that we will be discussing are CAHS470D and CAHS470D2. The later being the one in question.

December 3, 2002

The 470 Notification Letter was received with a date of December 03, 2001. The 470 Application Number is 864830000384604. It also verifies that the date the 470 was posted as being November 26, 2001. The Allowable Vendor Selection/Contract Date as being December 24, 2001.

471

January 13, 2002

On January 13, 2002, two 471s were filed on 470 Application No. 864830000384604. The Application Form Identifiers are CAHS471D and CAHS471D2. The contract award date and allowable service date for both were July 1, 2002 and the contract expiration dates were June 30, 2003.

At the time of the filing, I did not know what was considered a signed contract or how the contract date was figured. First, I was confused about what a signed contract really was. Then there was a problem of knowing what dates to put down for the signed contract date. Since I did not know the answer to either, I just decided to signed contract day as being the last day of the filing year. The best problem of all is the fact that there never was a contract or a signed contract.

The only document that was received was a bid. Then for the contract expiration date, I used the last day of the filing year (June 30), which was still wrong because of the no contract thing.

February 8, 2002

The 471 Receipt Acknowledgement Letters were received with a date of February 8, 2002. (CAHS471D and CAHS741D2).

Funding Commitment Letter

June 17, 2002

A Funding Commitment Decision Letter was received on June 17, 2002 stating:
Form 471 Application Number: 313341
Funding Request Number: 820443
Funding Status: Funded
SPIN: 143006222
Service Provider Name: McInnis Electric, Inc. Funding Status: As Yet Unfunded

July 1, 2002

Another Funding Commitment Decision Letter was received on July 1, 2002 stating:
Form 471 Application Number: 314299
Funding Request Number: 823440
Funding Status: As Yet Unfunded
SPIN: 143004694
Service Provider Name: MicroWarehouse, Inc.

October 8, 2002

A Funding Commitment Report was received with a data of October 8, 2002 stating:
Form 471 Application Number: 313341
Funding Request Number: 820443
Funding Status: Funded
SPIN: 143006222
Service Provider Name: McInnis Electric, Inc.
Pre Discount Amount: \$53, 556.13
Approved: \$48,200.52 modified by SLD

Another Funding Commitment Report was received with a date of October 8, 2002 stating:
Form 471 Application Number: 314299
Funding Request Number: 823440
Funding status: Funded
SPIN: 143004694
Service Provider Name: MicroWarehouse, Inc.
Pre Discount Amount: \$13,235.00
Approved: \$11,911.50

November 15, 2002

On November 15, 2002, a purchase order was received and sent to Julian Construction so that the work could be started and completed. The Purchase Order included both the FRNs 820443 and 823440 for the Amount of \$66, 740.00 (Pre Discount Amount) - FRN 820443 - \$53,556.13 and FRN 823440 - \$13,235.00. FRN 820443 - \$48,200.52 and FRN 823440 - \$11,911.50 (Approved). The PO was mailed and Julian Construction ordered the material.

SPIN Change

November 26, 2002

On November 26, 2002, an Email was sent to SLD asking if a SPIN change could be done and how to go about doing it. I found out that there were certain steps that had to be followed before it could be done. I was instructed were on SLD's website to go in order to get the instructions. I did just that and prepared all the information needed to do the SPIN changes. I first contacted the original vendors to see if they had a problem with the change. Neither company had a problem so I received the OK to start the process.

January 2 – January 10

According to the shipping slips, from January 2 until January 10, 2003, material was received from Julian Construction via the distributor. By the 15th of January, all the material had been received and installed.

January 8, 2003

Julian Construction did not have a SPIN so they had to apply for one. On January 8, 2003, an Email was received from Julian Construction stating that a SPIN number had been received.

January 13, 2003

On January 13, 2003, a SPIN change was mailed. The reason for the SPIN change was stated: "The original 470 was not bid properly. The bid process was not completed correctly until September. At that time, sealed bids were received and a new service provider was awarded the bid. (Julian Construction) The reason behind this change was the District Office informed the E-rate authorized personnel that because of the amount of the project, it had to be bid out. This is something that was not known at the time of the 470 process. It is still not known to this day if I really had to do it that way.

This SPIN change affected both FRNs: 820443 and 823440. Both service requests were awarded to Julian Construction. At the time, there was no award made to either company. The only thing that was received was a quote. Nothing was ever signed. I did not know, at the time, exactly what was considered a signed contract. I thought a quote was considered a signed contract.

(The most important part of the appeal)

January 16, 2003, February 2, 2003, and February 10, 2003

After all the materials were delivered, I got Julian Construction to go ahead and give me a bill. Julian Construction was going to have to turn around and pay their distributors for the material that was shipped to Coahoma AHS so I told him I would go ahead and get it into the system, because I knew it would take about two weeks for it to go through the system. The billing date was February 1, 2003. Accounting was not going to pay the bill until the due date, which was February 14, 2003. The check was cut on February 10, 2003

February 25, 2003

Several different Emails were received concerning the SPIN changes. On February 25, 2003, an Email was received from SLD asking for more information concerning the SPIN change. The needed information was emailed to SLD stating:

Application Number: 314299

Funding Request Number: 823440

The Original Service Provider: MicroWarehouse

Complete dollars associated to the New Service Provider: \$13, 235.00

New Service Provider: Julian Construction – 143026238

Complete dollars associated with New Service Provider: \$66,740.10 (total that includes this FRN plus FRN 820443 – next page) \$13,210.50 (covered in this FRN)

Proposed Service Date: Feb 1, 2003

The information that was needed and that was emailed included:

Application Number: 313341

Funding Request Number: 820443

The Original Service Provider: McInnis Electric, Inc. – 143006222

Complete dollars associated to the New Service Provider: \$53,556.13

New Service Provider: Julian Construction – 143026238

Complete dollars associated to the New Service Provider: \$66,740.10 (total which includes this FRN plus FRN 823440 –previous page) \$53,529.60 (covered in this FRN)

Proposed Effective date of New Service Provider

Both changes indicated that the proposed effective date of the New Service Provider was Feb 1, 2003. I am not quite sure where this date was taken except it could be the date that was chosen because that was the last date that any kind of equipment was received and installed. I am just not 100% sure.

May 18, 2003

On May 18, 2003, a fax was received from SLD stating:

Re: Universal Service Administrator's Confirmation of SPIN

The request change/correct the Service Provider has been granted

Form 471 Application Number: 313341

FRN: 820443

Original Service Provider: McInnis Electric, Inc.

Original SPIN: 143006222

New Service Provider: Julian Construction

New SPIN: 1430262328

Original Commitment Amount: \$48,200.52

Disbursement: 0

CAP Remaining: \$48,200.52

Date of : 5/9/03

A Form 486 has been filed for this: No

This FRN includes Non-Recurring: Yes

May 28, 2003

On May 28, 2003, another fax was received from SLD stating:

Re: Universal Service Administrator's Confirmation of SPIN

The request change/correct the Service Provider has been granted

Form 471 Application Number: 314299

FRN: 823440

Original Service Provider: MicroWarehouse, Inc.

Original SPIN: 143004694

New Service Provider: Julian Construction

New SPIN: 1430262328

Original Commitment Amount: \$11,911.50

Disbursement: 0

CAP Remaining: \$11,911.50

Date of : 5/9/03

A Form 486 has been filed for this: No

This FRN includes Non-Recurring: Yes

486

May 21, 2003

A 486 was filed on May 21, 2003

CAHS486B

Form 486 Application #: 213373

471 Application Number: 313341

Funding Request Number: 820443

Service Provider: Julian Construction

SPIN: 14302638

Funding Year Service Start Date (Earliest Date that Discounts Will Begin) (Cannot be before July 1 of the Funding Year for which you are requesting discounts): October 17, 2002

May 29, 2003

Another 486 was also filed on May 29, 2003

CAHS486C

Form 486 Application #: 214490

471 Application Number: 314299

Funding Request Number: 823440

Service Provider: Julian Construction

SPIN: 143026238

Funding Year Service Start Date (Earliest Date that Discounts Will Begin) (Cannot be before July 1 of the Funding Year for which you are requesting discounts): October 17, 2002

Both 486s have a Service Start Date of October 17, 2002. Looking back at these, I have no idea from where the date came. It was also believed and I think a common thing to go ahead and file a 486 before the work was done. This form just informed SLD that the work would be performed by the company that you noted on the 486. I do not think it was as it is now, when you do not file the 486 until the work is done. Many things were still unclear during this period.

June 4, 2003

A Form 486 Notification Letter was received dated June 4, 2003 stating:

Funding Request Number: 820443

Form 471 Application Number: 313341

Service Provider Name: Julian Construction, LLC.

SPIN: 143026238

Service Start Date: January 21, 2003*

Service Start Date Change Explanation: 120-Day 486 Deadline

Another Form 486 Notification Letter was received dated June 11, 2003 stating:

Funding Request Number: 823440

Form 471 Application Number: 314299

Service Provider Name: Julian Construction, LLC

Service Provider Identification Number: 14302638

Service Start Date: January 29, 2003

Service Start Date Change Explanation: 120-Day 486 Deadline

Again, here are two additional different service start dates. These are January 21, 2003 and January 29, 2003. Again, I do not know where the dates came from.

BEAR Form

May 30, 2003

On May 30, 2003, two BEAR Forms were filed. The first stated:

471 Application Number: 314299

Funding Request Number: 823440

Customer Bill Date: October 17, 2002

Total (Undiscounted Amount for Service): \$3, 235.00

Discounted Amount Billed to SLC: \$11,911.50

Signed by Service Provider on May 28, 2003

The second stated:

471 Application Number: 313341

Funding Request Number: 823443

Customer Billed Date: October 17, 2002

Total (Undiscounted Amount for Service) \$53,556.13

Discount Amount Billed to SLC: \$48,200.52

Here again is even another start date of October 17, 2002. This date is not associated with any other form.

A Form 472 (BEAR Form) Notification Letter was received dated October 3, 2003 stating:

Funding Request Number: 820443

471 Application Number: 313341

Funding Commitment Decision: \$48,200.52

Reimbursement Amount for this FRN: \$48,200.52

August 4, 2003

On August 4, 2003, a fax was received inquiring about additional information needed to successfully finish the BEAR Form 472. Here is the needed information we need from you so that we may complete data entry of your application for E-Rate Discounts.

The Service Provider (SPIN) is not certified for the funding year FY2002. Please contact Brandon Stallings of Julian Construction, LLC and request that a Form 473 (Service Provider Annual Certification) be filed as soon as possible.

Case#:1-915405

On the same day of August 4, 2003, another copy of the above documentation was received via a fax. Both an Email and faxed document was received.

August 26, 2003

On August 26, 2003, a faxed was received from USAC concerning:

Provider Invoice: CAHSBEAR3

SLC Invoice: 386096

Undiscounted Amount: \$13, 235.00

Requested: \$11,911.50

47#: 314299

FRN: 823440

Service: Internal Connections

Please provide copies of detailed Service Provider bills that agree to the amounts listed above; each item's functionality (use) and the time period for which the charges relate to (i.e. 7/02, 1/03-6/03, etc.) Along with these bills, please provide a summary sheet of the bills for each of the FRNs listed above that justify the undiscounted amount applied for, if there is more than one bill involved. If the bills are, contain the bill date, the invoice amount of each service provider bill. (2) Provide Signed Certification Form – see attachment. (3) Provide three month's representative bills only.

On August, the bills were faxed to SLD. (The invoice, explanation, and line item descriptions)

August 29, 2003

A Form 472 (BEAR Form) Notification Letter was received dated August 29, 2003 stating:

Funding Request Number: 823440

471 Application Number: 314299

Funding Commitment Decision: \$11,911.50

Reimbursement Amount for this FRN: \$0.00

Reimbursement Request Decision Explanation: Bill Date before service start date.

September 11, 2003

An Appeal to the Form 472 was faxed to SLD on September 11, 2003.

A fax sheet was received the afternoon of September 11, 2003 stating:

Re: 471 Application No. 313341

Coahoma Agricultural High School District

Invoice No. 38693

Your Invoice No. CAHSBEAR2

FRN 820443

As discussed this afternoon, I am in the process of viewing your 471 Application No. 313341

Coahoma Agricultural High School District – Invoice NO. 386093 – Your Invoice No.

CAHSBEAR2 – FRN No. 820443

A fax was sent back to SLD on September 11, 2003 stating:

Form 472 Invoice Number: 386096

Service Provider identification Number: 143026

Applicant Form 472 Identifier: CAHSBEAR3

Funding Request Number: 823440

Funding Commitment Decision: \$11,911.50

Reimbursement Request Decision Explanation: Bill date before Service Start Date.

I explained how I had to apply for a SPIN change. The beginning service date was February 1, 2003. The invoice date was January 15, 2003, which was two weeks before the project was to be complete. The total project was to be completed around February 10, 2003. The bill was only entered into the system on January 15, 2003 but was never paid until February 10, 2003. I did not know that I could not do it that way.

First of January 2004

By the beginning of January, 2004, I had not received any kind of response from the above correspondence so I called and was given a different fax number. I faxed the documentation again. I would have to guess that the first fax was never received because after I re-faxed it, I received a response.

March 17, 2004

An Administrator's Decision on Invoice Deadline Extension Request was received dated March 17, 2004 stating:

Re:

SLD Invoice Number: 386096

SLD Line Number(s): 1273406

Vendor Invoice Number: CAHSBEAR3

471 Application Number: 314299

Funding Request Number(s): 823440

Your Correspondence Dated: September 11, 2003

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision about your invoice deadline extension request for the invoice number indicated above.

Invoice Number: 386096

Line(s): 1273406

Decision on Request: Approved

June 15, 2004

A Form 472 (BEAR Form) Notification Letter was received dated June 15, 2004 stating

Funding Request Number: 823440

471 Application Number: 314299

Funding Commitment Decision: \$11,911.50

Reimbursement Amount for this FRN: \$11,911.50

The BEAR Form was accepted.

Then after I thought everything was clear, it started over again.

May 16, 2006

A Notification of Improperly Disbursed Funds Letter was received dated May 16, 2006 stating:

Funding Request Number: 823440

Service Ordered: Internal Connections

SPIN: 143026238

Service Provider Name: Julian Construction, LLC

Funding Commitment: \$11,911.50

Funds Disbursed to Date: \$11,911.50

Funds to be Recovered from Applicant: \$11,911.50

Disbursed Fund Recovery Explanation:

After a thorough investigation, it has been determined that funds were improperly disbursed on this funding request. During the course of a review it was determined that funding was disbursed for product and/or services delivered outside of the relevant funding year. The review of Form 486 has shown a service start date of January 29, 2003 and the supporting documentation (Invoice and Explanation) clearly indicate that the service was completed and invoiced on January 15, 2003. FCC rules require applicants to use recurring services within the relevant funding year, and to implement non-recurring services by the applicable deadline established by the Commission. In this instance, both the applicant and the service provider made the certification on the BEAR Form listed below indicating that the services had been provided within the funding year's applicable deadlines. On the Bear Form at column 13 and Block 3 Item A, the authorized person represents to USAC that the products and services were delivered

to the applicant within the applicable deadline for the relevant funding year. The SLD has determined that the applicant is responsible for this violation. Therefore, the SLD will seek recovery of the \$11,911.50 or improperly disbursed funds from the applicant.

May 24, 2006

An appeal was faxed on May 24, 2006 concerning:

Form 472 Invoice Number: 386096

Applicant Form 472 Identifier: CAHSBEAR3

Funding Request Number: 823440

471 Applicant Number: 314299

Reimbursement Amount for this FRN: \$11,911.50

Reimbursement Amount for this FRN: \$11,911.50

Reimbursement Request Decision Explanation: Bill date was before the start date.

June 1, 2006

An Administrator's Appeal Acknowledgement Letter was received dated June 1, 2006 stating: The Schools and Libraries Division of the Universal Service Administrator Company has received your correspondence dated May 14, 2006 on May 30, 2006, regarding the FY2002 funding decision of your Form 471 Application Number(s) 314299 – FRN(s) 823440

It was stated that they would review the correspondence carefully, consult the Program Integrity Assurance records and all supporting documentation, and Once the review process is completed, we will respond in writing.

December 21, 2006

An Administrator's Decision on Appeal – Funding Year 2002-2003 was received dated December 21, 2006 stating:

Form 471 Application Number: 314299

Funding Request Number(s): 823440

Your Correspondence Dated: May 24, 2006

After thorough review and investigation of all relevant facts, the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") has made its decision in regard to your appeal of USAC's Year 2002 Recovery of Improperly Disbursed Funds Letter (RIDF) for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60-day time for appealing the decision to the Federal Communications Commission ("FCC"). If your letter of appeal includes more than one Application Number, please note that for each application for which an appeal is submitted, a separate letter is sent.

Funding Request Number: 8234490

Decision of Appeal: Denied in full

Explanation:

You are appealing USAC's decision that funds were improperly disbursed for products and/or services delivered outside the relevant funding year for this funding request. You state after your first appeal (Invoicing Appeal), you received a eligible for funding amount of \$11,911.50. You also state that you included the information that explains the reason for the error as described in

your first appeal. You state that the real problem was the fact that you did not use the correct Service Start Date for the request as the project was completed two months earlier than indicated.

After a thorough review and all relevant supporting documentation, it was determined that funds were disbursed for products and/or services delivered outside of the relevant funding year. After reviewing the submitted Form 486 (Application 214490) it was determined that USAC adjusted the Service Start Date to reflect January 29, 2003 due to the late filing of the form. The supporting documentation (originally submitted service provider invoice and applicant explanation) within our records clearly indicates that the service was completed and invoiced by the service provider on January 15, 2003, which is prior to the adjusted start date. According to our records, a second Form 472 was submitted in March 2004 with a changed bill date of May 30, 2004, which ultimately resulted in the erroneous payment of the invoice and the improper disbursement of funds.

FCC requires applicants to use recurring services within the relevant funding year, and to implement nonrecurring services by the applicable deadline established by the Commission. In this case, both the applicant and the service provider made the certifications on the BEAR Form listed below indicating that the services had been provided within the funding year's applicable deadlines. On the BEAR form at column 13 and Block 3 Item A, the authorized person certifies that the products and services were delivered to the Applicant within the applicable deadline for the relevant funding year. It was determined during the appeal review that this was not adhered to. Consequently, the appeal is denied in full and USAC will continue to seek recovery of the \$11,911.50 of improperly disbursed funds.

January 4, 2007

A Demand Payment Letter was received dated January 4, 2007 stating:

Form 471 Application Number: 314299

Funding Year: 2002

Applicant's Form Identifier: CAHS471D

Billed Entity Number: 128535

FCC Registration Number: 0012270609

SPIN: Julian Construction

Service Provider Contact Person: Brandon Stallings

You were sent a Notification of Improperly Disbursed Letter informing you of the need to recover funds from you for the Funding Request Number(s) (FRNs) listed on the Funding Disbursement Report (Report) of that letter. A copy of that Report is also attached to this letter. Immediately preceding the Report is a guide that defines each line of the Report.

February 2, 2007

On February 02, 2007 an Appeal letter was faxed to FCC (1-202-418-0186) It was also mailed. Both fax acknowledgment sheet and Registered mailed documents are included.

February 6, 2007

A Demand Payment Letter – Second Request was received dated February 6, 2007 stating:

Past Due Notice – This notice provides important information about your account and your rights and obligations under law.

Re:

Form 471 Application Number: 314299

Funding Year: 2002
Applicant's From Identifier: CAHS471D
Billed Entity Number: 128535
FCC Registration Number: 0012270609
SPIN Name: Julian Construction, LLC
Service Provider Contact Person: Brandon Stallings

You were recently sent a Demand Payment Letter informing you of the need to recover funds for the Funding Request Number(s) (FRNs) listed on the Funding Disbursement Report (Report) attached to this letter. Our records indicate that you have not responded to the Demand Payment Letter. As of February 02, 2007, the debt was past due and delinquent.

February 13, 2007

On February 13, 2007, I called SLD (1-973-581-5395). I got a recording saying call 800-272-8100. I then called 1-202-776-0200 and they transferred me to customer support. I talked to a man who told me to call FCC (KEN) 877-480-3201. I was told we had a past due amount and transferred me to FCC (Financial Division).

I then talked to Judy Haley and she asked me to get all the information together that pertained to the appeal and call her back. She then looked it up in the system and could not find anything. I was not in my office so I had to get it to her the next day.

February 14, 2007

On February 14, 2007, I called 1-877-480-3201 opt 4 and gave Judy Haley all the information she needed to find out if they had received my appeal. She asked me to whom had I send it. I told her I just mailed it to the address that was on the letter. It did not have anyone's name. She asked me to mail it again and put it to her attention. After she received it, she would give me a tracking number. She asked me to mail it to:

FCC

Attention: Judith Haley

Cores Administrator

RM 2 – A842

445 12th Street SW

Washington, DC 20554

Then I was delayed in resending the appeal because of an audit that we were having done so I was not able to do it at that time. I also wanted to redo the appeal to explain everything a little more in detail. I later did a trace on the USP site and found out that it had been delivered on February 6, 2007. I had not received a delivery acknowledgment. It must have gotten lost in the shuffle.

February 26, 2007

On February 26 2007, I faxed a copy of my short appeal letter adding a note that a detailed appeal letter will be mailed to FCC with all supporting documentation within the next few days.

Today

Conclusion: With all of this documentation, must come a lot of confusion, to say the least. To make things plain and simple, I would like to state that there were many errors concerning the

dates on the various documents. The simplest and most true thing to say is that the material was received before the billing date (the original one of January 15, 2003). I do not know why there were so many different dates but to put that aside, everything was actually done in the right order. Material received, then billing received, and then bill paid. Why it got by me and why it was not noticed before now, and why the other FRN pasted is unknown but I do know that we do not desire the denial of our appeals.

We are a very small school district, with only one school, which is a high school. We have 289 students and are located in a poverty area in the Mississippi Delta. The district would not have been able to have our network installed if it were not for E-rate funds. There would be no reason why we would even want to try to misuse the funds.

The one major problem I have with the appeal is that both FRN 82044 and 823440 were combined into the same project and on the same invoice. There could not be anyway that one was ok while the other was not. This statement may make the other one wrong too (at least in the eyes of USAC) but I just cannot see that either were wrong.

Last Note and Recap

Material received Jan 1 – 10, 2003

Bill received Jan 15, 2003

Bill dated Feb 1, 2003

Bill due date: Feb 14, 2003

Bill Paid date: Feb 10, 2003

January 2 – January 10

According to the shipping slips, from January 2 until January 10, 2003, material was received from Julian Construction via the distributor. By the 15th of January, all the material had been received and installed.

January 16, 2003, February 2, 2003, and February 10, 2003

After all the materials were delivered, I got Julian Construction to go ahead and give me a bill. Julian Construction was going to have to turn around and pay their distributors for the material that was shipped to Coahoma AHS so I told him I would go ahead and get it into the system, because I knew it would take about two weeks for it to go through the system. The billing date was February 1, 2003. Accounting was not going to pay the bill until the due date, which was February 14, 2003. The check was cut on February 10, 2003

FCC Form 470



Approval by OMB
3060-0806

Estimated Average Burden Hours Per Response: 5.0 hours

This form is designed to help you describe the eligible telecommunications-related services you seek so that this data can be posted on the Fund Administrator Web Site and interested service providers can identify you as a potential customer and compete to serve you.

Please read instructions before completing

(To be completed by entity that will negotiate with Providers.)

Applicant's Form Identifier:

(Insert your own code to identify THIS Form 470)

CAHS470D

Form 470 Application #:

(To be inserted by Fund Administrator)

Block 1: Applicant Address and Identifications

(School, Library, or consortium desiring Universal Service funding.)

1. Name of Applicant: COAHOMA AGRI HIGH SCHOOL DIST			
2. Funding Year: Year 5 (07/01/2002 - 06/30/2003) ▼		3. Your Entity Number 128535	
4. Applicant's Street Address, P.O.Box, or Route Number			
a. Street 3240 FRIARS POINT RD			
City CLARKSDALE	State MS ▼	Zip Code 5Digit 38614	Zip Code 4Digit 9359
b. Telephone number (662) 621 - 4160		c. Fax number (662) 624 - 8045	
d. E-mail Address 			
5. Type Of Applicant (Check only one box) <input type="radio"/> Library (including library system, library branch, or library consortium applying as a library) <input type="radio"/> Individual School (individual public or non-public school) <input checked="" type="radio"/> School District (LEA; public or non-public [e.g., diocesan] local district representing multiple schools) <input type="radio"/> Consortium (intermediate service agencies, states, state networks, special consortia)			
6a. Contact Person's Name: Carol Borgognoni		Copy 4a-d above to 6b-e below	
Correct and/or add any Contact Person's information below as necessary, then select your preferred mode of contact			

6b. Street Address, P.O.Box, or Route Number (if different from Item 4)				
C 3240 FRIARS POINT RD				
City CLARKSDALE		State MS	Zip Code 5Digit 38614	Zip Code 4Digit 9359
C 6c. Telephone Number (10 digits + ext.)		(662) 621 - 4260	ext.	
C 6d. Fax Number (10 digits + ext.)		(662) 624 - 8045		
C 6e. E-mail Address (50 characters max.)		cborgognoni@mde.k12.ms.us		

[<< Previous](#)
[Reset](#)
[Next >>](#)

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FCC Form 470



Entity Number: 128535

Applicant's Form Identifier: CAHS470D

Contact Person: Carol Borgognoni

Phone Number: 662-621-4260

**Please Record This Form 470 Application Number For Future Reference:
This Number Must Be Used To Complete Your Application,
If You Leave This Process Before The Application Is Completed.**

Form 470 Application#: 864830000384604

Next >>

FCC Form 470



Approval by OMB
3060-0806

Entity Number: 128535

Contact Person: Carol Borgognoni

Applicant's Form Identifier: CAHS470D

Phone Number: 662-621-4260

Block 2: Summary Description of Needs or Services Requested

7 This Form 470 describes (check all that apply):
a. <input type="checkbox"/> Tariffed services - telecommunications services, purchased at regulated prices, for which the applicant has no signed, written contract. A new Form 470 must be filed for tariffed services for each funding year.
b. <input type="checkbox"/> Month-to-month services for which the applicant has no signed, written contract. A new Form 470 must be filed for these services for each funding year.
c. <input checked="" type="checkbox"/> Services for which a new written contract is sought for the funding year in Item 2.
d. <input type="checkbox"/> A multi-year contract signed on or before 7/10/97 but for which no Form 470 has been filed in a previous program year.
NOTE: Services that are covered by a signed, written contract executed pursuant to posting of a Form 470 in a previous program year OR a contract signed on/before 7/10/97 and reported on a Form 470 in a previous year as an existing contract do NOT require filing of a Form 470.

[<< Previous](#)

[Reset](#)

[Next >>](#)

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FCC Form 470



Approval by OMB
3060-0806

Entity Number: 128535

Contact Person: Carol Borgognoni

Applicant's Form Identifier: CAHS470D

Phone Number: 662-621-4260

Block 2: Summary Description of Needs or Services Requested

What kinds of services are you seeking for Telecommunications Services? (See the Eligible Services List and Addenda at www.sl.universalservice.org for examples). Please answer the questions below if you select this category.

8 ☐ Telecommunications Services

Do you have a Request for Proposal (RFP) that specifies the services you are seeking ?

a ☐ YES, I have an RFP. Choose one of the following: It is available on the Web at

or via ☐ the Contact Person in Item 6 or ☐ the contact listed in Item 11.

b ☐ NO, I do not have an RFP for these services.

If you answered NO, you must list below the Telecommunications Services you seek. Specify each **service or function** (e.g., local voice service) and quantity and/or capacity (e.g., 20 existing lines plus 10 new ones). See the Eligible Services List at www.sl.universalservice.org for examples of eligible Telecommunications Services, and remember that only common carrier telecommunications companies can provide these services under the Universal Service support mechanism. Add additional lines if needed.

Service or Function:

Quantity and/or Capacity:

FCC Form 470



Approval by OMB
3060-0806

Entity Number: 128535

Contact Person: Carol Borgognoni

Applicant's Form Identifier: CAHS470D

Phone Number: 662-621-4260

Block 2: Summary Description of Needs or Services Requested

What kinds of services are you seeking for Internet Access ? (See the Eligible Services List and Addenda at www.sl.universalservice.org for examples). Please answer the questions below if you select this category.

9 <input type="checkbox"/> Internet Access Do you have a Request for Proposal (RFP) that specifies the services you are seeking ?	
a <input type="checkbox"/> YES , I have an RFP. Choose one of the following: It is available on the Web at or via <input type="checkbox"/> the Contact Person in Item 6 or <input type="checkbox"/> the contact listed in Item 11.	
b <input type="checkbox"/> NO , I do not have an RFP for these services. If you answered NO, you must list below the Internet Access Services you seek. Specify each service or function (e.g., monthly Internet service) and quantity and/or capacity (e.g., for 500 users). See the Eligible Services List at www.sl.universalservice.org for examples of eligible Internet Access Services. Add additional lines if needed.	
Service or Function:	Quantity and/or Capacity:
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
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<< Previous | Reset | Enter More Services | Next >>

FCC Form 470



Approval by OMB
3060-0806

Entity Number: 128535

Contact Person: Carol Borgognoni

Applicant's Form Identifier: CAHS470D

Phone Number: 662-621-4260

Block 2: Summary Description of Needs or Services Requested

What kinds of services are you seeking for Internal Connections? (See the Eligible Services List at www.sl.universalservice.org for examples). Please answer the questions below if you select this category.

10 <input checked="" type="checkbox"/> Internal Connections	
Do you have a Request for Proposal (RFP) that specifies the services you are seeking ?	
a <input type="checkbox"/> YES, I have an RFP. Choose one of the following: It is available on the Web at or via <input type="checkbox"/> the Contact Person in Item 6 or <input type="checkbox"/> the contact listed in Item 11.	
b <input checked="" type="checkbox"/> NO, I do not have an RFP for these services.	
If you answered NO, you must list below the Internal Connections Services you seek. Specify each service or function (e.g., local area network) and quantity and/or capacity (e.g., connecting 10 rooms and 300 computers at 56Kbps or better). See the Eligible Services List at www.sl.universalservice.org for examples of eligible Internal Connections Services. Add additional lines if needed.	
Service or Function:	Quantity and/or Capacity:
Upgrade backbone to 1GB	1
Cache Engine	1
LAN Upgrades	1
Maintenance Contract	1
Connect building using fiber	1
Connect building using wireless	1

[<< Previous](#) [Reset](#) [Enter More Services](#) [Next >>](#)

FCC Form 470



Approval by OMB
3060-0806

Entity Number: 128535

Applicant's Form Identifier: CAHS470D

Contact Person: Carol Borgognoni

Phone Number: 662-621-4260

Block 2: Summary Description of Needs or Services Requested

11 (Optional) Please name the person on your staff or project who can provide additional technical details or answer specific questions from service providers about the services you are seeking. This need not be the contact person listed in Item 6 nor the signer of this form.

Name: _____	Title: _____
-------------	--------------

Telephone number (10 digits + ext.) _____	Ext. _____
-------------------------------------------	------------

Fax number _____

E-mail Address _____

12. ☐ Check here if there are any restrictions imposed by state or local laws or regulations on how or when providers may contact you or on other bidding procedures. Please describe below any such restrictions or procedures, and/or provide a Web address where they are posted and provide a contact name and telephone number for service providers without Internet access.

--

13. (Optional) Purchases in future years: If you have plans to purchase additional services in future years, or expect to seek new contracts for existing services, summarize below (including the likely time-frames).

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[<< Previous](#)

[Reset](#)

[Next >>](#)

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FCC Form 470



Approval by OMB
3060-0806

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Block 3: Technology Assessment

14. ☐ **Basic telephone service only:** If your application is for basic local and long distance voice telephone service only, check this box and skip to Item 16.
15. Although the following services and facilities are ineligible for support, they are usually necessary to make effective use of the eligible services requested in this application. Unless you indicated in Item 14 that your application is ONLY for basic telephone service, you must check at least one box in (a) through (e). You may provide details for purchases being sought.

a. Desktop communications software: Software required <input checked="" type="checkbox"/> has been purchased; and/or <input type="checkbox"/> is being sought.
b. Electrical systems: <input type="checkbox"/> adequate electrical capacity is in place or has already been arranged; and/or <input checked="" type="checkbox"/> upgrading for additional electrical capacity is being sought.
c. Computers: a sufficient quantity of computers <input type="checkbox"/> has been purchased; and/or <input checked="" type="checkbox"/> is being sought.
d. Computer hardware maintenance: adequate arrangements <input checked="" type="checkbox"/> have been made; and/or <input type="checkbox"/> are being sought.
e. Staff development: <input type="checkbox"/> all staff have had an appropriate level of training or additional training has already been scheduled; and/or <input checked="" type="checkbox"/> training is being sought.
f. Additional details: Use this space to provide additional details to help providers to identify the services you desire.
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<< Previous

Reset

Next >>

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FCC Form 470



Approval by OMB
3060-0806

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Applicant's Form Identifier: CAHS470D

Phone Number: 662-621-4260

Block 4: Recipients of Service

16. Eligible Entities That Will Receive Service:

Check the ONE choice that best describes this application and the eligible entities that will receive the services described in this application. You will then list in Item 17 the entity/entities that will pay the bills for these services.

You must select a state if (b) or (c) is selected:

Mississippi

a. ☐ **Individual school or single-site library:** Check here, and enter the billed entity in Item 17.

b. ☐ **Statewide application (check all that apply):**

- ☐ All public schools/districts in the state:
- ☐ All non-public schools in the state:
- ☐ All libraries in the state:

If your statewide application includes INELIGIBLE entities, check here. ☐ If checked, complete Item 18.

c. ☒ **School district, library system, or consortium application to serve multiple eligible sites:**

Number of eligible sites	1
<i>For these eligible sites, please provide the following</i>	
Area Codes (list each unique area code)	Prefixes associated with each area code (first 3 digits of phone number) separate with commas, leave no spaces
662	621, 624, 627

FCC Form 470



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3060-0806

Entity Number: 128535

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Area Codes and Prefixes

State	Area Codes	Prefixes
MS	662	621, 624, 627

[<< Previous](#)

[Next >>](#)

FCC Form 470



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3060-0806

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Phone Number: 662-621-4260

Billed Entities

Entity Name	Entity Number
COAHOMA AGRI HIGH SCHOOL DIST	128535

[<< Previous](#)

[Next >>](#)

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